

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: CARLTON W. FREEMAN AND
NECHA E. FREEMAN
Debtors.**

CASE NO. 12-10650

Chapter 13

MOTION TO MODIFY PLAN

COMES NOW the Debtors, Carlton W. Freeman and Necha E. Freeman, through counsel, and file this Motion to Modify Plan and for good cause would show:

1. The debtors filed this case on February 17, 2012.
2. This case was confirmed on June 22, 2012.
3. CitiMortgage, Inc. filed a proof of claim on August 3, 2012, showing an amount of secured claim of \$40,165.30 and a loan maturity date of April 1, 2013.
4. The debtors desire to have their plan modified to pay the secured claim to CitiMortgage, Inc., over the life of their plan and have their plan payments adjusted accordingly.

WHEREFORE, premises considered, the debtors pray to this Honorable Court the following:

1. That this Motion be received and filed and upon a hearing thereon that the debtors' plan be modified to pay the secured claim to CitiMortgage, Inc. over the life of the plan.
2. That the Trustee adjust their plan payments accordingly.
3. For such other and further relief as necessary.

Respectfully submitted,

\s\ Heidi S. Milam
Heidi S. Milam, Bar No. 9813
Attorney for Debtor
P.O. Box 1169
Southaven, MS 38671
(662) 349-2322

CERTIFICATE OF SERVICE

I, Heidi S. Milam, certify that the above Motion to Modify Plan was served on the following parties and creditors:

Locke D. Barkley, sbeasley@barkley13.com

U. S. Trustee, USTPRegion05.AB.ECF@usdoj.gov

CitiMortgage, Inc.
P.O. Box 6030
Sioux Falls, SD 57117-6030

This the 7th day of September, 2012.

\s\ Heidi S. Milam
Heidi S. Milam